

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Terry L. Bell,

Plaintiff,

V.

loanDepot.com, LLC,

Defendant.

Civil File No.

## NOTICE OF REMOVAL

TO: Plaintiff and his attorneys, John H. Goolsby, Goolsby Law Office, LLC, 475  
Cleveland Avenue, Suite 212, St. Paul, MN 55104.

Pursuant to 28 U.S.C. § 1446, Defendant loanDepot.com, LLC (“loanDepot”), hereby gives notice of the removal of the above-entitled action to the United States District Court for the District of Minnesota, and in support of the Notice of Removal states as follows:

1. On or about February 27, 2017, Plaintiff Terry Bell commenced an action against loanDepot in the Hennepin County District Court entitled *Terry L. Bell v. loanDepot.com, LLC* (the “State Action”).

2. Copies of all process, pleadings, and orders served on loanDepot in the State Action are attached as Exhibit A to this Notice of Removal.

3. The United States District Court for the District of Minnesota has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff alleges that loanDepot violated the Equal Credit Opportunity Act, 15 U.S.C. § 1691, *et seq.*, which arises under federal law. (Cmpl., ¶¶ 21-25.) The United States District Court for the

District of Minnesota has supplemental jurisdiction over the remaining claims in this action under the provisions of 28 U.S.C. § 1367.

4. This Notice of Removal is timely under 28 U.S.C. § 1446(b) because it was filed within thirty days after service of the Summons and Complaint on loanDepot.

5. The United States District Court for the District of Minnesota is the District Court for the district embracing the entire state of Minnesota, where the State Action is currently pending. *See* 28 U.S.C. § 103. Venue is therefore proper in this district pursuant to 28 U.S.C. § 1441(a).

6. LoanDepot makes no admission of liability by this Notice and expressly reserves its right to raise all defenses and objections to Plaintiff's claims after the action is removed to the above Court, including, without limitation, any objections to the merits and sufficiency of Plaintiff's pleadings.

Dated: March 20, 2017.

**Hinshaw & Culbertson LLP**

s/ Ellen B. Silverman

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